Open Letter to FCM: Request for Clarification on PCP Requirements, GMF Programs, and FCM's Representation

GATHER 2030
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Dear FCM Leadership,

As elected officials, community leaders, and engaged citizens across Canada, we recognize the scale of investment and activity being advanced through the Green Municipal Fund (GMF), which you recently celebrated for its 25 years of operation as outlined in your September 22, 2025 announcement. With $311 million in approved funding last year alone and over $2.4 billion now managed in federal contributions, the scope and influence of FCM's programs on local governance is substantial.

Given this significant role, we respectfully seek clarity on the following points of accountability and representation:

1. GMF Access and PCP Requirements
Is participation in the *Partners for Climate Protection (PCP)* program a requirement for municipalities to access GMF funds? If so, we request a full breakdown:

- For which streams or programs is PCP participation mandatory?
- What proportion of GMF disbursements are restricted to PCP municipalities?
- Are municipalities without PCP commitments excluded from funding?

While PCP is described publicly as a *voluntary* program, if it is required to unlock funding streams then its voluntary nature is only nominal. In practice, this would amount to a coercive condition that pressures councils to adopt policy frameworks beyond their jurisdiction in order to access support.

2. Local Priorities or Federal Mandates?
GMF programs—such as electric vehicle infrastructure, net-zero housing, and climate mitigation projects—appear closely aligned with federal government policy commitments, including the Paris Accord and UNSDG objectives. We ask:

- Are GMF programs primarily responding to municipal demand, or are they designed to implement federal government directives at the local level?
- Is FCM transferring federal responsibilities onto municipalities, such as funding, planning, or operating federal climate initiatives like EV charging infrastructure?

📊 **By the Numbers**
According to your own reporting, GMF has reduced 2.98 million tonnes of greenhouse gas emissions since 2000. While that figure may sound significant in isolation, it represents only:

- **0.517% of Canada's annual emissions**
- **0.008% of global human-caused emissions**
- **0.000145% of atmospheric CO_2**

This is roughly equivalent to preserving 38.7 million trees annually. Yet Canada is already home to an estimated 318 billion trees. That means GMF's entire emission reduction, after billions of dollars invested, represents only about 0.01% of Canada's existing forest stock absorption each year.

Given the scale of investment—over $2.4 billion in federal funds—municipal leaders deserve clarity about whether these results justify the costs, and whether alternative approaches might better reflect local priorities and needs.

3. Representation, International Affiliations, and Accountability
FCM describes itself as the "national voice of municipalities." However, questions remain about external relationships:

- Does FCM represent municipalities first and foremost, or does it also serve as an implementing partner for the federal government and the United Nations?
- What is the formal relationship between FCM and ICLEI (Local Governments for Sustainability)?

- Given ICLEI's stated role as an official UN partner in advancing the UNSDGs and Paris Accord, how does this influence FCM's programs, funding streams, and municipal guidance?

4. Constitutional Jurisdiction
Municipal powers and responsibilities fall under *Section 92 of the Constitution Act, 1867*, which vests authority over municipalities in the provinces. In this light:

- Does FCM recognize a potential conflict when federal and UN-linked programs are advanced through municipalities, bypassing provincial oversight?
- Could participation in GMF funding be considered coercive if councils feel pressured to adopt federal/UN policy frameworks in order to access basic infrastructure support?

5. Alternative Funding Options
Finally, we ask:

- Are there federal funding options for municipalities that are *not tied* to climate action frameworks, UNSDG adoption, or participation in international programs?
- If so, can FCM provide a clear list so that councils may weigh their options independently?

In closing, we urge FCM to respond directly and transparently to these questions. Canadian municipalities deserve clear information to make democratic, accountable choices about participation in national and international programming.

Respectfully,
Maggie Hope Braun
National Organizer, KICLEI Canada

On behalf of signatories – councils, associations, citizens
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